

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

Orient Plus International Limited; Union Hi-Tech Development Limited; and Golden Genius International Limited,

Plaintiffs,

vs.

Baosheng Media Group Holdings Limited; Wenxiu Zhong; Sheng Gong; Yu Zhong; Zuohao Hu; Adam (Xin) He; Yue Jin; Yanjun Hu; Univest Securities, LLC; The Benchmark Company, LLC; WestPark Capital, Inc.; Friedman LLP; and Marcum LLP,

Defendants.

Civil Action No. 1:24-cv-00744-JLR

**DEFENDANTS UNIVEST SECURITIES, LLC, THE BENCHMARK COMPANY, LLC,  
AND WESTPARK CAPITAL, INC.'S**

**NOTICE OF MOTION TO DISMISS THE THIRD AMENDED COMPLAINT**

PLEASE TAKE NOTICE that Defendants Univest Securities, LLC, The Benchmark Company, LLC, and Westpark Capital, Inc.'s (the "Underwriters"), by their undersigned counsel, hereby move this Honorable Court for an Order, pursuant to Rules 12(b)(6) and 9(b) of the Federal Rules of Civil Procedure, dismissing the Third Amended Complaint as to the Underwriters, with prejudice, for failure to state a claim upon which relief can be granted.

In support of its motion, the Underwriters will rely upon their Memorandum of Law, the Declaration of Angus Ni and its exhibits, submitted concurrently, as well as any further argument and briefing as may be presented at or before any hearing.

Respectfully Submitted,

Dated: December 20, 2024

**MORROW NI LLP**

By: \_\_\_\_\_

A handwritten signature in black ink, appearing to be 'A. Ni', written over a horizontal line.

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*Attorneys for Underwriters*